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December 19, 2023

VIA ECF

Magistrate Judge Jose R. Almonte
United States District Court
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

Re: George Mandarakas v. The University of Notre Dame du Lac, et al.
Civil Action No. 2:23-cv-02539
Our File No. 14375-141930

Dear Magistrate Almonte:

We represent The University of Notre Dame du Lac, the defendant in this matter. I write on behalf of both parties to request that the Court extend the deadline for advising it of any discovery disputes from December 20, 2023 to January 5, 2024.

The request is due to the fact that Plaintiff's father is ill and he has been unable to locate and produce all documents requested. Without the documents, it is not possible for us to determine the scope of all discovery disputes and bring them to the Court's attention.

Given that the documents are also needed to conduct the depositions, the parties also request that the other dates in the current Scheduling Order be extended for a comparable period of time. The proposed dates are as follows:

- Notify Court of any discovery disputes: January 5, 2024
- Fact discovery closes: March 4, 2024
- Affirmative expert reports due: April 4, 2024
- Responding expert reports due: May 3, 2024
- Expert discovery closes: June 3, 2024

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Thank you for your consideration of this matter.

Respectfully submitted,

CONNELL FOLEY LLP

/s/ Marianne C. Tolomeo

Marianne C. Tolomeo

MCT/mr

cc: W. Charles Sipio, Esq.
Samantha Martin, Esq.